## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

Robenson Jean-Pierre and Jean Metelus, on behalf of themselves and all others similarly situated,

Plaintiffs,

VS.

J&L Cable TV Services, Inc,

Defendant.

Civil Action No. 1:18-cv-11499-MLW

**COLLECTIVE AND CLASS ACTION** 

NOTICE OF FILING OF CONSENTS TO JOIN COLLECTIVE ACTION

### NOTICE OF FILING CONSENTS TO JOIN COLLECTIVE ACTION

Plaintiffs Robenson Jean-Pierre and Jean Metelus, individually and on behalf of all persons similarly situated, hereby files the following Opt-In Consent Forms, submitted herewith as Exhibits 1 through 3, pursuant to the Fair Labor Standards, Act, 29 U.S.C. §§ 201, et seq.

### CONSENTS TO JOIN COLLECTIVE ACTION

EXHIBIT NUMBER	NAME	OPT-IN NUMBER
1	Sandlay Cajuste	19
2	Pierre A. Rene	20
3	Guilo Phillipe	21

Date: September 27, 2018 Respectfully submitted,

<u>/s/ Michelle S. Lim\_\_\_\_\_</u>

Carolyn Hunt Cottrell (admitted *pro hac vice*) Ori Edelstein (admitted *pro hac vice*) Michelle S. Lim (admitted *pro hac vice*)

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Sarah R. Schalman-Bergen (admitted *pro hac vice*) Stacy Savett (*pro hac vice* to be submitted) Shoshana Savett (admitted *pro hac vice*)

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sschalman-bergen@bm.net
stasavett@bm.net
stsavett@bm.net

Attorneys for Plaintiffs, the Collective and Putative Class

### **CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the above document was served upon the attorney of record for all parties through the Court's ECF system on September 27, 2018.

/s/ Michelle S. Lim_	
Michelle S. Lim	

# EXHIBIT 1

### **OPT-IN CONSENT FORM**

Robenson Jean-Pierre v. J&L Cable TV Services, Inc. United States District Court, District of Massachusetts

#### **Complete And Submit To:**

Carolyn Hunt Cottrell, Esq. SCHNEIDER WALLACE COTTRELL KONECKY WOTKYNS LLP 2000 Powell Street, Suite 1400 Emeryville, California 94608

OR

Sarah R. Schalman-Bergen BERGER & MONTAGUE, P.C. 1622 Locust Street Philadelphia, Pennsylvania 19103

Name: SANDLAY CAJUSTE (Please Print)	Date of Birth:
Address:	Phone No. 1: Phone No. 2: E-mail Address

### <u>CONSENT TO JOIN COLLECTIVE ACTION</u> Pursuant to the Fair Labor Standards Act, 29 U.S.C. §§ 201, et seq.

I consent and agree to pursue my claims relating to and arising from Defendant (J&L Cable TV Services, Inc.)

1.

9/27/2018

	alleged violations of the Fair Labor Standards Act, 29 U.S.C. §§ 201, et seq. in connection with the above-referenced litigation.
2.	I have worked as a/an (title) Technician for Defendant in (city, state) West Brom on or about (date) 5/15/2017 on or about (date) 6/23/2016 to
3.	I understand that this litigation has been filed as a proposed collective action under the Fair Labor Standards Act of 1938, as amended, 29 U.S.C. §§ 201, <i>et seq.</i> I hereby consent, agree, and opt-in to become a Plaintiff herein and be bound by any judgment of the Court or any settlement of this action.
4.	I specifically authorize my attorneys, Schneider Wallace Cottrell Konecky Wotkyns and Berger & Montague to prosecute this lawsuit on my behalf and to negotiate a settlement of any and all claims I have against the Defendant in this litigation.

\*\*IMPORTANT NOTE\*\*

(Date Signed)

Statute of Limitations concerns mandate that you return this form as soon as possible to preserve your rights.

# EXHIBIT 2

#### **OPT-IN CONSENT FORM**

Robenson Jean-Pierre v. J&L Cable TV Services, Inc. United States District Court, District of Massachusetts

#### **Complete And Submit To:**

Carolyn Hunt Cottrell, Esq. SCHNEIDER WALLACE COTTRELL KONECKY WOTKYNS LLP 2000 Powell Street, Suite 1400 Emeryville, California 94608

OR

Sarah R. Schalman-Bergen BERGER & MONTAGUE, P.C. 1622 Locust Street Philadelphia, Pennsylvania 19103

Name: Pierre A Rene (Please Print)	Date of Birth:
Address:	Phone No. 1: Phone No. 2: E-mail Address:

## <u>CONSENT TO JOIN COLLECTIVE ACTION</u> Pursuant to the Fair Labor Standards Act, 29 U.S.C. §§ 201, et seq.

1.

	referenced litigation.	ur Labor Standards	s Act, 29 U.S.C.	. 88 2	201,	et seq.	in connec	ction with the	above-
2.	I have worked as a/an (title)	CABLE TECHNICIA						te) <u>BOCARATON</u>	
		from_	approximately	on	or	about	(date)	05/24/2017	to
	approximately on or about (d	late) <u>04/15/2018</u>	·						

I consent and agree to pursue my claims relating to and arising from Defendant (J&L Cable TV Services, Inc.)

- 3. I understand that this litigation has been filed as a proposed collective action under the Fair Labor Standards Act of 1938, as amended, 29 U.S.C. §§ 201, *et seq.* I hereby consent, agree, and opt-in to become a Plaintiff herein and be bound by any judgment of the Court or any settlement of this action.
- 4. I specifically authorize my attorneys, Schneider Wallace Cottrell Konecky Wotkyns and Berger & Montague to prosecute this lawsuit on my behalf and to negotiate a settlement of any and all claims I have against the Defendant in this litigation.

9/27/2018		Pierre d Kerre	
	(Date Signed)	8BCCAA164CF84FF	(Signature)

\*\*IMPORTANT NOTE\*\*

Statute of Limitations concerns mandate that you return this form as soon as possible to preserve your rights.

# EXHIBIT 3

### **OPT-IN CONSENT FORM**

Robenson Jean-Pierre v. J&L Cable TV Services, Inc. United States District Court, District of Massachusetts

### **Complete And Submit To:**

Carolyn Hunt Cottrell, Esq. SCHNEIDER WALLACE COTTRELL KONECKY WOTKYNS LLP 2000 Powell Street, Suite 1400 Emeryville, California 94608

OR

Sarah R. Schalman-Bergen BERGER & MONTAGUE, P.C. 1622 Locust Street Philadelphia, Pennsylvania 19103

Name: Guilo Phillipe (Please Print)	Date of Birth:
Address:	Phone No. 1: Phone No. 2: E-mail Address

## <u>CONSENT TO JOIN COLLECTIVE ACTION</u> Pursuant to the Fair Labor Standards Act, 29 U.S.C. §§ 201, et seq.

I consent and agree to pursue my claims relating to and arising from Defendant (J&L Cable TV Services, Inc.)

1.

9/27/2018

	alleged violations of the Fair Labor Standards Act, 29 U.S.C. §§ 201, et seq. in connection with the above-referenced litigation.
2.	I have worked as a/an (title) Installation for Defendant in (city, state) Florida on or about (date) 09/24/2016 on or about (date) 11/28/2017 to
3.	I understand that this litigation has been filed as a proposed collective action under the Fair Labor Standards Act of 1938, as amended, 29 U.S.C. §§ 201, <i>et seq.</i> I hereby consent, agree, and opt-in to become a Plaintiff herein and be bound by any judgment of the Court or any settlement of this action.
4.	I specifically authorize my attorneys, Schneider Wallace Cottrell Konecky Wotkyns and Berger & Montague to prosecute this lawsuit on my behalf and to negotiate a settlement of any and all claims I have against the Defendant in this litigation.

\*\*IMPORTANT NOTE\*\*

(Date Signed)

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